

TWIN CITY FOODS, INC. (PWS 2350032)
SOURCE WATER ASSESSMENT FINAL REPORT

October 16, 2002



State of Idaho
Department of Environmental Quality

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Executive Summary

Under the Safe Drinking Water Act Amendments of 1996, all states are required by the U.S. Environmental Protection Agency to assess every source of public drinking water for its relative sensitivity to contaminants regulated by the Act. This assessment is based on a land use inventory of the designated source water assessment area and sensitivity factors associated with the well and aquifer characteristics.

This report, *Source Water Assessment for Twin City Foods, Inc., Lewiston, Idaho*, describes the public drinking water system, the boundaries of the zones of water contribution, and the associated potential contaminant sources located within these boundaries. This assessment should be used as a planning tool, taken into account with local knowledge and concerns, to develop and implement appropriate protection measures for this source. **The results should not be used as an absolute measure of risk and they should not be used to undermine public confidence in the water system.**

The Twin City Foods, Inc. drinking water system consists of one well. The well, drilled in 1952 to 630 feet deep, serves approximately 28 people through one connection. The water system is also connected to the City of Lewiston system as a backup in the unlikely event of a pump breakdown.

Final susceptibility scores are derived from equally weighing system construction scores, hydrologic sensitivity scores, and potential contaminant/land use scores. Therefore, a low rating in one or two categories coupled with a higher rating in other categories results in a final rating of low, moderate, or high susceptibility. With the potential contaminants associated with most urban and heavily agricultural areas, the best score a well can get is moderate. Potential Contaminants/Land Uses are divided into four categories, inorganic contaminants (IOCs, i.e. nitrates, arsenic), volatile organic contaminants (VOCs, i.e. petroleum products), synthetic organic contaminants (SOCs, i.e. pesticides), and microbial contaminants (i.e. bacteria). As different wells can be subject to various contamination settings, separate scores are given for each type of contaminant.

In terms of total susceptibility, the Twin City Foods, Inc. well rated moderate for IOCs, automatically high for VOCs, moderate for SOCs, and automatically high for microbials. The automatic high ratings are due to carbon tetrachloride (September, 1998) and total coliform (May 1995) detections in the well.

No SOCs have ever been detected in the well. Trace concentrations of IOCs have been detected, but significantly below maximum contamination levels (MCLs) as set by the Environmental Protection Agency (EPA). For instance, nitrate was detected many times between December 1993 and November 2001, but never reached more than 50% of its MCL. The disinfection by-product chloroform was detected in September, 1998. Though water cannot be totally free of by-products when disinfection is used, they can be reduced by treatment modifications. Treatment techniques, technologies, and plant modifications that water systems could use to reduce the amount of disinfection by-products produced can be found at EPA's website, (www.epa.gov).

This assessment should be used as a basis for determining appropriate new protection measures or re-evaluating existing protection efforts. No matter what ranking a source receives, protection is always important. Whether the source is currently located in a "pristine" area or an area with numerous industrial and/or agricultural land uses that require surveillance, the way to ensure good water quality in the future is to act now to protect valuable water supply resources. If the system should need to expand in the future, new well sites should be located in areas with as few potential sources of contamination as possible, and the site should be reserved and protected for this specific use.

For the Twin City Foods, Inc., drinking water protection activities should first focus on correcting any deficiencies outlined in the sanitary survey (an inspection conducted every five years with the purpose of determining the physical condition of a water system's components and its capacity). Actions should be taken to keep a 50-foot radius circle clear of all potential contaminants from around the wellhead. Any contaminant spills within the delineation should be carefully monitored and dealt with. As much of the designated protection areas are outside the direct jurisdiction of the Twin City Foods, Inc., collaboration and partnerships with state and local agencies, and industry groups should be established and are critical to the success of drinking water protection. In addition, the well should maintain sanitary standards regarding wellhead protection.

Due to the time involved with the movement of ground water, drinking water protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term. For assistance in developing protection strategies please contact the Lewiston Regional Office of the Idaho Department of Environmental Quality or the Idaho Rural Water Association.

SOURCE WATER ASSESSMENT FOR TWIN CITY FOODS, INC., LEWISTON, IDAHO

Section 1. Introduction - Basis for Assessment

The following sections contain information necessary to understand how and why this assessment was conducted. **It is important to review this information to understand what the rankings of this assessment mean.** Maps showing the delineated source water assessment area and the inventory of significant potential sources of contamination identified within that area are attached. The list of significant potential contaminant source categories and their rankings used to develop the assessment is also included.

Background

Under the Safe Drinking Water Act Amendments of 1996, all states are required by the U.S. Environmental Protection Agency (EPA) to assess every source of public drinking water for its relative susceptibility to contaminants regulated by the Safe Drinking Water Act. This assessment is based on a land use inventory of the delineated assessment area and sensitivity factors associated with the wells and aquifer characteristics.

Level of Accuracy and Purpose of the Assessment

Since there are over 2,900 public water sources in Idaho, there is limited time and resources to accomplish the assessments. All assessments must be completed by May of 2003. An in-depth, site-specific investigation of each significant potential source of contamination is not possible. **Therefore, this assessment should be used as a planning tool, taken into account with local knowledge and concerns, to develop and implement appropriate protection measures for this source. The results should not be used as an absolute measure of risk and they should not be used to undermine public confidence in the water system.**

The ultimate goal of the assessment is to provide data to local communities to develop a protection strategy for their drinking water supply system. The Idaho Department of Environmental Quality (DEQ) recognizes that pollution prevention activities generally require less time and money to implement than treatment of a public water supply system once it has been contaminated. DEQ encourages communities to balance resource protection with economic growth and development. The local community, based on its own needs and limitations, should determine the decision as to the amount and types of information necessary to develop a drinking water protection program. Wellhead or drinking water protection is one facet of a comprehensive growth plan, and it can complement ongoing local planning efforts.

Section 2. Conducting the Assessment

General Description of the Source Water Quality

The Twin City Foods, Inc. drinking water system consists of one well. The well, drilled in 1952 to 630 feet deep, serves approximately 28 people through one connection. The water system is also connected to the City of Lewiston system as a backup in the unlikely event of a pump breakdown.

No SOC's have been detected in the well. Trace concentrations of IOC's have been detected, but significantly below MCLs as set by the EPA. For instance, nitrate was detected many times between December 1993 and November 2001, but never reached more than 50% of its MCL. The disinfection by-product chloroform was detected in September, 1998. Though water cannot be totally free of by-products when disinfection is used, they can be reduced by treatment modifications. Treatment techniques, technologies, and plant modifications that water systems could use to reduce the amount of disinfection by-products produced can be found at EPA's website, (www.epa.gov).

Defining the Zones of Contribution – Delineation

The delineation process establishes the physical area around a well that will become the focal point of the assessment. The process includes mapping the boundaries of the zone of contribution into time-of-travel (TOT) zones (zones indicating the number of years necessary for a particle of water to reach a well) for water in the aquifer. DEQ contracted with the University of Idaho to perform the delineations using a refined computer model approved by the EPA in determining the 3-year (Zone 1B), 6-year (Zone 2), and 10-year (Zone 3) TOT for water associated with the basalt aquifer of the Clearwater Plateau in the vicinity of the Twin City Foods, Inc. wells. The computer model used site specific data, assimilated by the University of Idaho from a variety of sources including operator input, local area well logs, and hydrogeologic reports (detailed below).

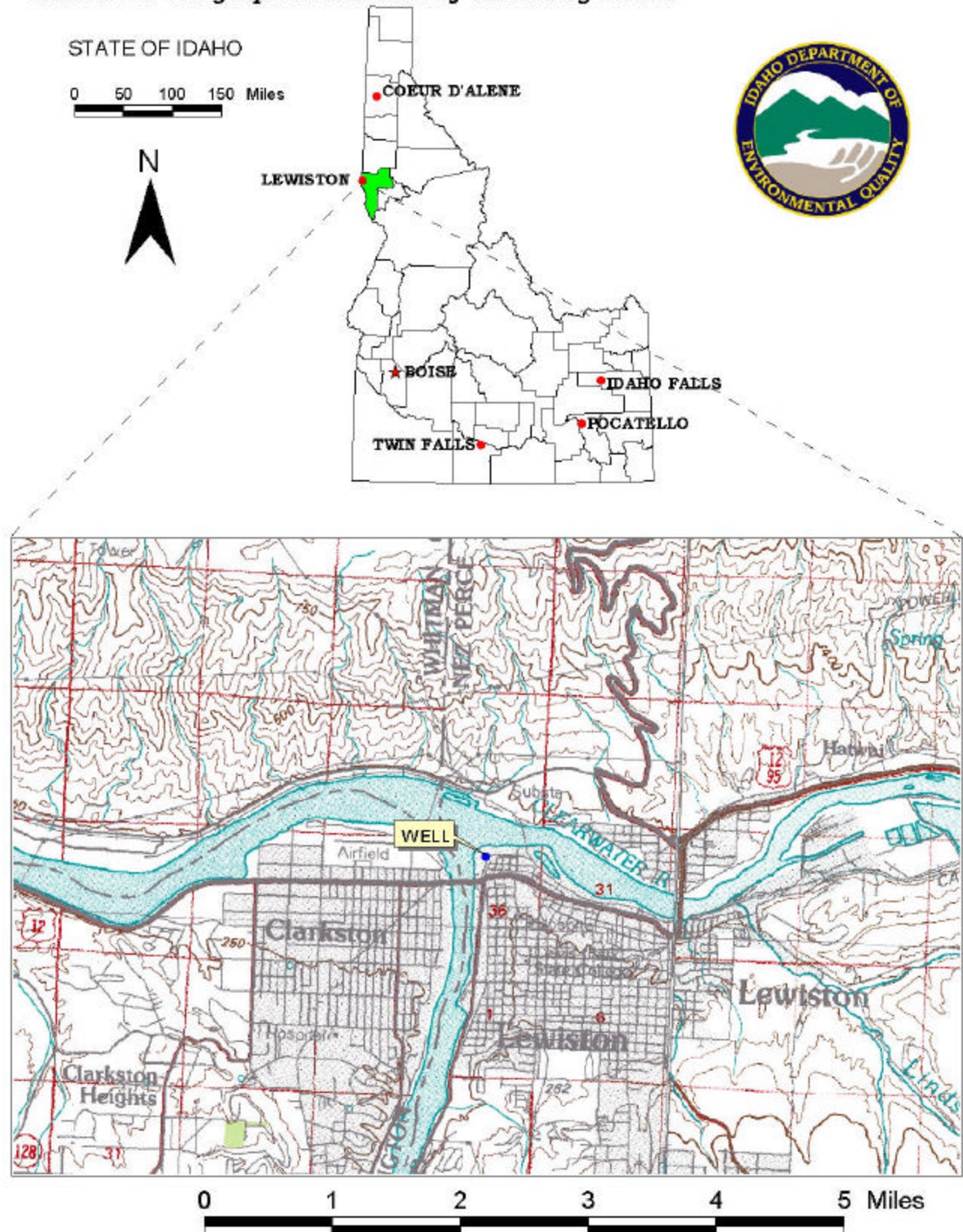
Hydrogeologic Setting

The Tammany source wells are located southeast of Lewiston, and are completed in Wanapum Formation Basalts. The Wanapum Formation of the Columbia River Basalt Flows overlies the Grande Ronde Formation. Ground water wells in the Wanapum are not as productive as are wells in the Grande Ronde, typically producing 50 gpm or less. However, the Wanapum, where present, is more accessible to drilling because it is above the Grande Ronde.

A geologic map (Rember and Kauffman, 1993) was used to document where the Wanapum is exposed and has been eroded away. This includes the Lapwai /Sweetwater Creek region to the east, and the Snake River to the west. The Wanapum has not been removed entirely along the Snake River - there is a reach between Asotin and the confluence that may be continuous under the Snake River.

Groundwater in the Wanapum Formation in the vicinity of Lewiston has been modeled by others (Wyatt-Jakims, 1994; steady-state base case) to be flowing from the southeast toward the confluence of the Snake and the Clearwater.

FIGURE 1. Geographic Location of Twin City Foods



A component of vertical recharge into the Wanapum is assumed to exist in this basin because the basalts overlying the Wanapum are laterally discontinuous as a result of the many rivers which have downcut through the formation.

Precipitation is 13 inches/year in Lewiston-Clarkston, whereas higher elevation areas average close to 25 inches annually (Cohen and Ralston, 1980). A modeling effort documented by Wyatt-Jaykim (1994), concluded on the basis of available data that 1 to 2 inches/year is a conservative estimate for recharge to the basalt aquifers in the vicinity of Lewiston and Lewiston Orchards. This ignores irrigation losses Wyatt-Jaykim (1994) that would supplement regional recharge in the vicinity of Lewiston Orchards. This is considered defensible for this model, despite the shallow stratigraphy of the Wanapum, because the Tammany wells are upgradient of Lewiston Orchards.

The capture zones delineated herein are based upon limited data and must be taken as best estimates. If more data become available in the future these delineations should be adjusted based on additional modeling incorporating the new data.

The delineated source water assessment area for the well of Twin City Foods can best be described as northward trending teardrop shaped corridor that extends approximately 0.6 miles north of the Clearwater river and is approximately 1 mile wide at its widest point (Figure 2). The actual data used by the University of Idaho in determining the source water assessment delineation area is available from DEQ upon request.

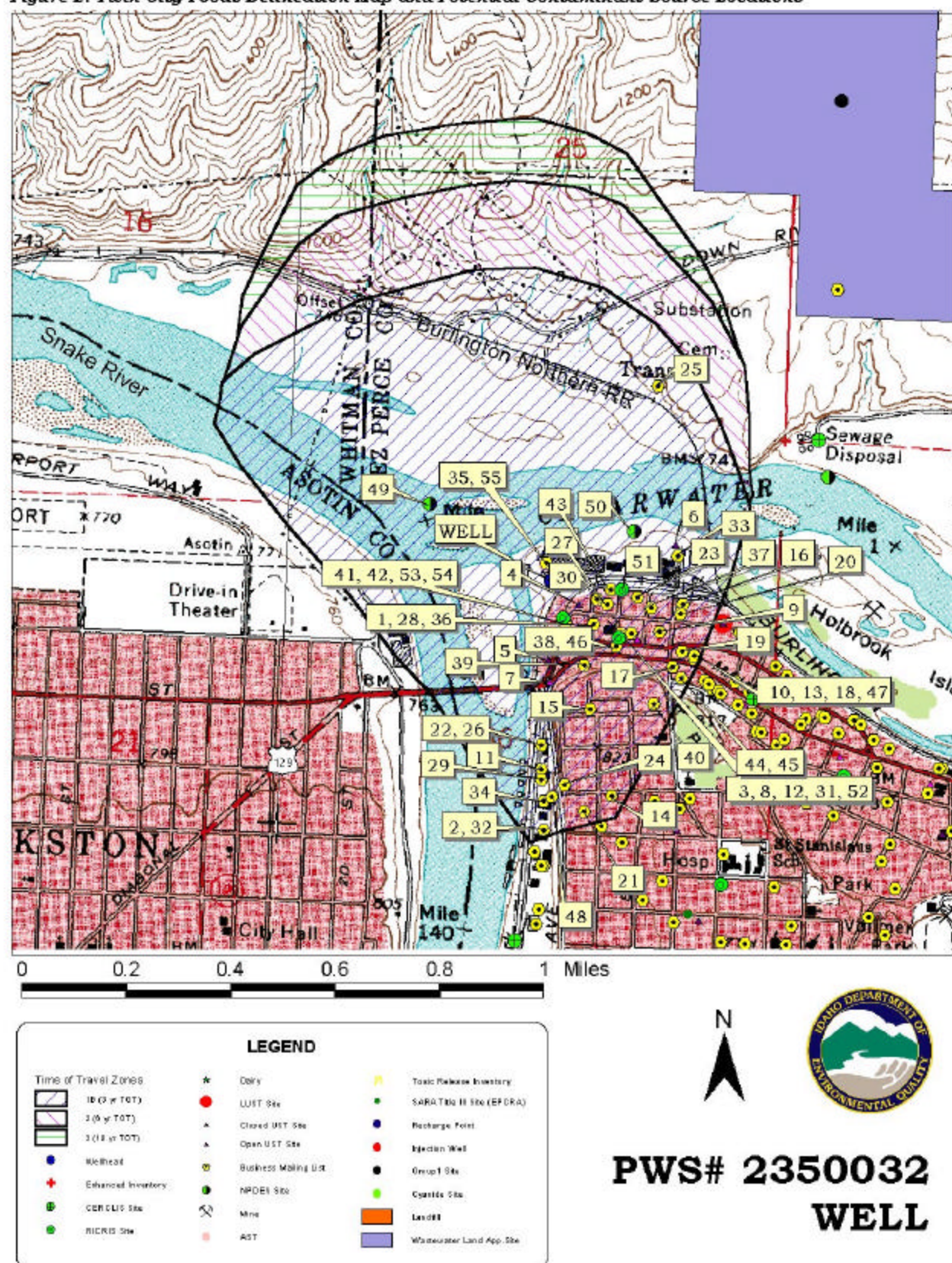
Identifying Potential Sources of Contamination

A potential source of contamination is defined as any facility or activity that stores, uses, or produces, as a product or by-product, the contaminants regulated under the Safe Drinking Water Act and has a sufficient likelihood of releasing such contaminants at levels that could pose a concern relative to drinking water sources. The goal of the inventory process is to locate and describe those facilities, land uses, and environmental conditions that are potential sources of groundwater contamination. The locations of potential sources of contamination within the delineation areas were obtained by field surveys conducted by DEQ and from available databases.

Land use within the immediate area and the surrounding area of the Twin City Foods, Inc. well is mostly urban and commercial.

It is important to understand that a release may never occur from a potential source of contamination provided they are using best management practices. Many potential sources of contamination are regulated at the federal level, state level, or both to reduce the risk of release. Therefore, when a business, facility, or property is identified as a potential contaminant source, this should not be interpreted to mean that this business, facility, or property is in violation of any local, state, or federal environmental law or regulation. What it does mean is that the potential for contamination exists due to the nature of the business, industry, or operation. There are a number of methods that water systems can use to work cooperatively with potential sources of contamination, including educational visits and inspections of stored materials. Many owners of such facilities may not even be aware that they are located near a public water supply well.

Figure 2. Twin City Foods Delineation Map and Potential Contaminant Source Locations



Contaminant Source Inventory Process

A two-phased contaminant inventory of the study area was conducted in March 2002. The first phase involved identifying and documenting potential contaminant sources within the Twin City Foods, Inc. source water assessment area (Figure 2) through the use of computer databases and Geographic Information System (GIS) maps developed by DEQ. Specifically, a list of 2001 business licenses was obtained from the City of Lewiston Planning and Zoning Commission. That list was narrowed down to local businesses which contain potential contaminant sources. Exact locations were entered into DEQ's database by cross-referencing business license addresses with parcel addresses from a planning and zoning map obtained from the City. Any cross-referenced data that did not match addresses exactly was confirmed either by phone or physically ground truthing its location. The second, or enhanced, phase of the contaminant inventory involved contacting the operator to identify and add any additional potential sources in the area.

The delineated source water assessment area of the Twin City Foods, Inc. well contains underground storage tanks (USTs), a national pollutant discharge elimination system (NPDES site), a superfund amendment and reauthorization act (SARA site), above ground storage tanks (ASTs), and many service and industrial related businesses in the northwest corner of the City of Lewiston (Table 1 and Figure 2). In addition, the Snake and Clearwater Rivers, and Burlington Northern Railroad exist within the delineation. These sources can contribute leachable contaminants to the aquifer in the event of an accidental spill, release, or flood.

Table 1. Twin City Foods, Inc. East Side Well, Potential Contaminant Inventory.

Site	Description of Source ¹	TOT ² Zone	Source of Information	Potential Contaminants ³
1	UST SITE, Commercial; Open	3 YR	Database Search	VOC, SOC
2	UST SITE, Utilities; Closed	3 YR	Database Search	VOC, SOC
3	UST SITE, Not Listed; Open	3 YR	Database Search	VOC, SOC
4	UST SITE, Commercial; Closed	3 YR	Database Search	VOC, SOC
5, 35, 50, 53, 54, 55	Foods-Frozen-Manufacturers, RCRA Site, SARA, NPDES, UST, AST	3 YR	Database Search	IOC, VOC, SOC, Microbials
6	UST SITE, Local Government; Closed	3 YR	Database Search	VOC, SOC
7	UST SITE, Open	3 YR	Database Search	VOC, SOC
8	UST SITE, Open	3 YR	Database Search	VOC, SOC
9	Hardware-Retail	3 YR	Database Search	IOC, VOC, SOC
10	Screen Printing	3 YR	Database Search	IOC, VOC
11	Electric Equipment & Supplies	3 YR	Database Search	IOC, VOC
12	Roofing Contractors	3 YR	Database Search	IOC, VOC, SOC
13	Photographers-Portrait	3 YR	Database Search	IOC, VOC
14	Filters-Air & Gas-Cleaning Service	3 YR	Database Search	IOC, VOC, SOC
15	Computers-Manufacturers	3 YR	Database Search	IOC, VOC
16	Automobile Dealers-New Cars	3 YR	Database Search	IOC, VOC, SOC
17	Mining Companies	3 YR	Database Search	IOC, VOC, SOC
18	Signs (Manufacturers)	3 YR	Database Search	IOC, VOC, SOC
19	Laboratories-Dental	3 YR	Database Search	IOC, VOC, SOC
20	Newspapers (Publishers)	3 YR	Database Search	IOC, VOC
21	Florists-Wholesale	3 YR	Database Search	IOC, SOC
22	Lawn Maintenance	3 YR	Database Search	IOC, SOC, Microbials
23	Automobile Body-Repairing & Painting	3 YR	Database Search	IOC, VOC, SOC
24	Sewing Contractors	3 YR	Database Search	SOC
25	Sawmills & Planing Mills-General	3 YR	Database Search	IOC, VOC, SOC

Site	Description of Source ¹	TOT ² Zone	Source of Information	Potential Contaminants ³
26	Pest Control	3 YR	Database Search	IOC, SOC
27	Automobile Repairing & Service	3 YR	Database Search	IOC, VOC, SOC
28	Printers-Business Forms	3 YR	Database Search	IOC, VOC
29	Boats-Excursion	3 YR	Database Search	IOC, VOC, SOC
30	Printers	3 YR	Database Search	IOC, VOC
31	Grain-Dealers (Wholesale)	3 YR	Database Search	IOC, SOC, Microbials
32	Tools-Manufacturers	3 YR	Database Search	IOC, VOC, SOC
33	Controls Control Sys/Regulators	3 YR	Database Search	IOC, VOC
34	Boat Builders	3 YR	Database Search	IOC, VOC, SOC
36	HVAC, sales, service, installation	3 YR	Database Search	IOC, VOC, SOC
37	Film and Video Production	3 YR	Database Search	IOC, VOC
38	Retail Tobacco	3 YR	Database Search	VOC, SOC, Microbials
39	Contracted Transportation	3 YR	Database Search	IOC, VOC, SOC
40	Photographic Art Sales	3 YR	Database Search	IOC, VOC
41	Retail floor coverings, windows, walls	3 YR	Database Search	IOC, VOC, SOC
42	Floor Seals	3 YR	Database Search	IOC, VOC, SOC
43	Industrial Water Blasting and Cleaning	3 YR	Database Search	IOC, VOC, SOC
44	Tattoo and piercing	3 YR	Database Search	VOC, SOC
45	Tanning Salon	3 YR	Database Search	VOC
46	Photography	3 YR	Database Search	IOC, VOC
47	Laminating, rubber stamps, engraving	3 YR	Database Search	IOC, VOC, SOC
48	Chimney Cleaning	3 YR	Database Search	VOC
49	NPDES SITE, Industrial discharge	3 YR	Database Search	IOC, VOC
51	RCRA SITE	3 YR	Database Search	IOC, VOC, SOC
52	RCRA SITE	3 YR	Database Search	IOC, VOC, SOC
	Snake River	3, 6 YR	GIS Map	IOC, VOC, SOC, Microbials
	Clearwater River	3, 6 YR	GIS Map	IOC, VOC, SOC, Microbials
	Burlington Northern Railroad	3, 6, 10 YR	GIS Map	IOC, VOC, SOC, Microbials

¹ UST =Underground Storage Tank, SARA = Superfund Amendments and Reauthorization Act, AST = Aboveground Storage Tanks, RCRA = Resource Conservation Recovery Act, NPDES = National Pollutant Discharge Elimination System

² TOT = time-of-travel (in years) for a potential contaminant to reach the wellhead

³ IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical

Section 3. Susceptibility Analyses

Each well's susceptibility to contamination was ranked as high, moderate, or low risk according to the following considerations: hydrologic characteristics, physical integrity of the well, land use characteristics, and potentially significant contaminant sources. The susceptibility rankings are specific to a particular potential contaminant or category of contaminants. Therefore, a high susceptibility rating relative to one potential contaminant does not mean that the water system is at the same risk for all other potential contaminants. The relative ranking that is derived for each well is a qualitative, screening-level step that, in many cases, uses generalized assumptions and best professional judgement. Attachment A contains the susceptibility analysis worksheets for the system. The following summaries describe the rationale for the susceptibility ranking.

Hydrologic Sensitivity

The hydrologic sensitivity of a well is dependent upon four factors: the surface soil composition, the material in the vadose zone (between the land surface and the water table), the depth to first ground water, and the presence of a 50-foot thick fine-grained zone (aquitar) above the producing zone of the well. Slowly draining soils such as silt and clay typically are more protective of ground water than coarse-grained soils such as sand and gravel. Similarly, fine-grained sediments in the subsurface and a water depth of more than 300 feet protect the ground water from contamination.

Hydrologic sensitivity is moderate for the well. The soils and vadose zone are both permeable and the depth to first water is less than 300 feet, increasing the score. However, an aquitar is present to reduce the speed of water movement between the water table and the well's producing zone.

Well Construction

Well construction directly affects the ability of the well to protect the aquifer from contaminants. System construction scores are reduced when information shows that potential contaminants will have a more difficult time reaching the intake of the well. Lower scores imply a system is less vulnerable to contamination. For example, if the well casing and annular seal both extend into a low permeability unit, then the possibility of contamination is reduced and the system construction score goes down. If the highest production interval is more than 100 feet below the water table, then the system is considered to have better buffering capacity. If the wellhead and surface seal are maintained to standards, as outlined in sanitary surveys, then contamination down the well bore is less likely. If the well is protected from surface flooding and is outside the 100-year floodplain, then contamination from surface events is reduced. A sanitary survey was conducted in 2000 for the system.

The Twin City Foods, Inc. well rated low for system construction. The surface seal and casing both extend into units of low permeability. The wellhead and surface seal are maintained, and is protected from surface flooding by graded land about the wellhead and a casing at least 12 inches high. The well's highest production is more than 100 feet below static water level, and the well is located outside of the 100-year floodplain.

Though the wells may have been in compliance with standards when they were completed, current PWS well construction standards are more stringent. The Idaho Department of Water Resources *Well Construction Standards Rules* (1993) require all PWSs to follow DEQ standards as well. IDAPA 58.01.08.550 requires that PWSs follow the *Recommended Standards for Water Works* (1997) during construction. These standards include provisions for well screens, pumping tests, and casing thicknesses to name a few. Table 1 of the *Recommended Standards for Water Works* (1997) lists the required steel casing thickness for various diameter wells. It is unknown if casing thickness meets the current standard. A 24-inch casing requires 0.5 inch thickness and a 20-inch casing requires 0.375 inch thickness. As such, the well was assessed an additional point in the system construction rating.

Potential Contaminant Source and Land Use

The well of the Twin City Foods, Inc. rated moderate for IOCs (i.e. nitrates, arsenic), VOCs (i.e. petroleum products, chlorinated solvents), and SOC (i.e. pesticides), and low for microbial contaminants (i.e. bacteria). The number and location of potential contaminant sources within the delineation contributed to the land use score.

Final Susceptibility Ranking

An IOC detection above a drinking water standard MCL, any detection of a VOC or SOC, or a detection of total coliform bacteria or fecal coliform bacteria at the wellhead will automatically give a high susceptibility rating to a well despite the land use of the area because a pathway for contamination already exists. In this case an automatic high susceptibility to VOCs and microbials was given to the well. Additionally, if there are contaminant sources located within 50 feet of the source then the wellhead will automatically get a high susceptibility rating. Hydrologic sensitivity and system construction scores are heavily weighted in the final scores. Having multiple potential contaminant sources in the 0 to 3-year time of travel zone (Zone 1B) and agricultural land contribute greatly to the overall ranking.

Table 2. Summary of Twin City Foods, Inc. Susceptibility Evaluation

Well	Susceptibility Scores ¹									
	Hydrologic Sensitivity	Contaminant Inventory				System Construction	Final Susceptibility Ranking			
		IOC	VOC	SOC	Microbials		IOC	VOC	SOC	Microbials
Well	M	M	M	M	L	L	M	H*	M	H**

¹H = High Susceptibility, M = Moderate Susceptibility, L = Low Susceptibility,

IOC = inorganic chemical, VOC = volatile organic chemical, SOC = synthetic organic chemical

H* = Automatic high susceptibility due to Carbon Tetrachloride and Chloroform detection (September 1998) in the well

H** = Automatic high susceptibility due to the detection of Total Coliform (May 1995) in the well

Susceptibility Summary

The Twin City Foods, Inc. drinking water system consists of one well. The well, drilled in 1952 to 630 feet deep, serves approximately 28 people through one connection. The water system is also connected to the City of Lewiston system as a backup in the unlikely event of a pump breakdown.

In terms of total susceptibility, the Twin City Foods, Inc. well rated moderate for IOCs, automatically high for VOCs, moderate for SOC, and automatically high for microbials. The automatic high ratings are due to carbon tetrachloride (September, 1998), and total coliform (May 1995) detections in the well.

Section 4. Options for Drinking Water Protection

The susceptibility assessment should be used as a basis for determining appropriate new protection measures or re-evaluating existing protection efforts. No matter what the susceptibility ranking a source receives, protection is always important. Whether the source is currently located in a “pristine” area or an area with numerous industrial and/or agricultural land uses that require surveillance, the way to ensure good water quality in the future is to act now to protect valuable water supply resources.

For the Twin City Foods, Inc., drinking water protection activities should first focus on correcting any deficiencies outlined in the sanitary survey. No chemicals should be stored or applied within the 50-foot radius of the wellhead. As much of the designated protection areas are outside the direct jurisdiction of the Twin City Foods, Inc., collaboration and partnerships with state and local agencies, and industry groups should be established and are critical to the success of drinking water protection. In addition, the well should maintain sanitary standards regarding wellhead protection.

Due to the time involved with the movement of ground water, drinking water protection activities should be aimed at long-term management strategies even though these strategies may not yield results in the near term. A strong public education program should be a primary focus of any drinking water protection plan as the delineation encompasses urban and commercial land uses. Public education topics could include proper lawn and garden care practices, hazardous waste disposal methods, proper care and maintenance of septic systems, and the importance of water conservation to name but a few. There are multiple resources available to help communities implement protection programs, including the Drinking Water Academy of the EPA.

A system must incorporate a variety of strategies in order to develop a comprehensive drinking water protection plan, be they regulatory in nature (i.e. zoning, permitting) or non-regulatory in nature (i.e. good housekeeping, public education, specific best management practices). For assistance in developing protection strategies please contact the Lewiston Regional Office of the DEQ or the Idaho Rural Water Association.

Assistance

Public water supplies and others may call the following DEQ offices with questions about this assessment and to request assistance with developing and implementing a local protection plan. In addition, draft protection plans may be submitted to the DEQ office for preliminary review and comments.

Lewiston Regional DEQ Office (208) 799-4370

State DEQ Office (208) 373-0502

Website: <http://www.deq.state.id.us>

Water suppliers serving fewer than 10,000 persons may contact Melinda Harper, mharper@idahoruralwater.com, Idaho Rural Water Association, at 208-343-7001 for assistance with drinking water protection (formerly wellhead protection) strategies.

POTENTIAL CONTAMINANT INVENTORY

LIST OF ACRONYMS AND DEFINITIONS

AST (Aboveground Storage Tanks) – Sites with aboveground storage tanks.

Business Mailing List – This list contains potential contaminant sites identified through a yellow pages database search of standard industry codes (SIC).

CERCLIS – This includes sites considered for listing under the **Comprehensive Environmental Response Compensation and Liability Act (CERCLA)**. CERCLA, more commonly known as ASuperfund, is designed to clean up hazardous waste sites that are on the national priority list (NPL).

Cyanide Site – DEQ permitted and known historical sites/facilities using cyanide.

Dairy – Sites included in the primary contaminant source inventory represent those facilities regulated by Idaho State Department of Agriculture (ISDA) and may range from a few head to several thousand head of milking cows.

Deep Injection Well – Injection wells regulated under the Idaho Department of Water Resources generally for the disposal of stormwater runoff or agricultural field drainage.

Enhanced Inventory – Enhanced inventory locations are potential contaminant source sites added by the water system. These can include new sites not captured during the primary contaminant inventory, or corrected locations for sites not properly located during the primary contaminant inventory. Enhanced inventory sites can also include miscellaneous sites added by the Idaho Department of Environmental Quality (DEQ) during the primary contaminant inventory.

Floodplain – This is a coverage of the 100year floodplains.

Group 1 Sites – These are sites that show elevated levels of contaminants and are not within the priority one areas.

Inorganic Priority Area – Priority one areas where greater than 25% of the wells/springs show constituents higher than primary standards or other health standards.

Landfill – Areas of open and closed municipal and non-municipal landfills.

LUST (Leaking Underground Storage Tank) – Potential contaminant source sites associated with leaking underground storage tanks as regulated under RCRA.

Mines and Quarries – Mines and quarries permitted through the Idaho Department of Lands.)

Nitrate Priority Area – Area where greater than 25% of wells/springs show nitrate values above 5 mg/L.

NPDES (National Pollutant Discharge Elimination System) – Sites with NPDES permits. The Clean Water Act requires that any discharge of a pollutant to waters of the United States from a point source must be authorized by an NPDES permit.

Organic Priority Areas – These are any areas where greater than 25 % of wells/springs show levels greater than 1% of the primary standard or other health standards.

Recharge Point – This includes active, proposed, and possible recharge sites on the Snake River Plain.

RICRIS – Site regulated under **Resource Conservation Recovery Act (RCRA)**. RCRA is commonly associated with the cradle to grave management approach for generation, storage, and disposal of hazardous wastes.

SARA Tier II (Superfund Amendments and Reauthorization Act Tier II Facilities) – These sites store certain types and amounts of hazardous materials and must be identified under the Community Right to Know Act.

Toxic Release Inventory (TRI) – The toxic release inventory list was developed as part of the Emergency Planning and Community Right to Know (Community Right to Know) Act passed in 1986. The Community Right to Know Act requires the reporting of any release of a chemical found on the TRI list.

UST (Underground Storage Tank) – Potential contaminant source sites associated with underground storage tanks regulated as regulated under RCRA.

Wastewater Land Applications Sites – These are areas where the land application of municipal or industrial wastewater is permitted by DEQ.

Wellheads – These are drinking water well locations regulated under the Safe Drinking Water Act. They are not treated as potential contaminant sources.

NOTE: Many of the potential contaminant sources were located using a geocoding program where mailing addresses are used to locate a facility. Field verification of potential contaminant sources is an important element of an enhanced inventory.

Where possible, a list of potential contaminant sites unable to be located with geocoding will be provided to water systems to determine if the potential contaminant sources are located within the source water assessment area.

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Attachment A

Twin City Foods, Inc. Susceptibility Analysis Worksheet

The final scores for the susceptibility analysis were determined using the following formulas:

- 1) VOC/SOC/IOC Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.2)
- 2) Microbial Final Score = Hydrologic Sensitivity + System Construction + (Potential Contaminant/Land Use x 0.375)

Final Susceptibility Scoring:

0 - 5 Low Susceptibility

6 - 12 Moderate Susceptibility

≥ 13 High Susceptibility

1. System Construction

SCORE

Drill Date	09/25/1952	
Driller Log Available	YES	
Sanitary Survey (if yes, indicate date of last survey)	YES	2000
Well meets IDWR construction standards	NO	1
Wellhead and surface seal maintained	YES	0
Casing and annular seal extend to low permeability unit	YES	0
Highest production 100 feet below static water level	YES	0
Well located outside the 100 year flood plain	YES	0
Total System Construction Score		1

2. Hydrologic Sensitivity

Soils are poorly to moderately drained	NO	2
Vadose zone composed of gravel, fractured rock or unknown	YES	1
Depth to first water > 300 feet	NO	1
Aquitard present with > 50 feet cumulative thickness	YES	0
Total Hydrologic Score		4

3. Potential Contaminant / Land Use - ZONE 1A

		IOC Score	VOC Score	SOC Score	Microbial Score
Land Use Zone 1A	URBAN/COMMERCIAL	2	2	2	2
Farm chemical use high	NO	0	0	0	
IOC, VOC, SOC, or Microbial sources in Zone 1A	YES	NO	YES	NO	YES
Total Potential Contaminant Source/Land Use Score - Zone 1A		2	2	2	2

Potential Contaminant / Land Use - ZONE 1B

Contaminant sources present (Number of Sources)	YES	38	35	37	4
(Score = # Sources X 2) 8 Points Maximum		8	8	8	8
Sources of Class II or III leacheable contaminants or	YES	10	10	10	
4 Points Maximum		4	4	4	
Zone 1B contains or intercepts a Group 1 Area	NO	0	0	0	0
Land use Zone 1B	Less Than 25% Agricultural Land	0	0	0	0
Total Potential Contaminant Source / Land Use Score - Zone 1B		12	12	12	8

Potential Contaminant / Land Use - ZONE II

Contaminant Sources Present	YES	2	2	2	
Sources of Class II or III leacheable contaminants or	YES	1	1	1	
Land Use Zone II	Less than 25% Agricultural Land	0	0	0	
Potential Contaminant Source / Land Use Score - Zone II		3	3	3	0

Potential Contaminant / Land Use - ZONE III

Contaminant Source Present	YES	1	1	1	
Sources of Class II or III leacheable contaminants or	YES	1	1	1	
Is there irrigated agricultural lands that occupy > 50% of	NO	0	0	0	
Total Potential Contaminant Source / Land Use Score - Zone III		2	2	2	0

Cumulative Potential Contaminant / Land Use Score

19 19 19 10

4. Final Susceptibility Source Score

9 9 9 9

5. Final Well Ranking

Moderate High Moderate High